



February 2, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Subject:** *GN Docket No. 17-199  
Inquiry Concerning Deployment of Advanced Telecommunications  
Capability to All Americans in a Reasonable and Timely Fashion*

Dear Ms. Dortch:

On January 31, 2018, Hughes Network Systems, LLC ("Hughes") met with Commission staff regarding the Commission's Section 706 Report in the above-referenced docket. Specifically, Hughes met separately with Jay Schwarz of the Office of Chairman Pai; Claude Aiken and April Jones of the Office of Commissioner Mignon Clyburn; Amy Bender of the Office of Commissioner Michael O'Rielly; and Travis Litman of the Office of Commissioner Jessica Rosenworcel. Hughes was represented by the undersigned and counsel L. Charles Keller of Wilkinson Barker Knauer LLP.

In the meeting, our presentation followed the attached talking points, which were distributed to the attendees.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/  
Jennifer A. Manner  
Senior Vice President, Regulatory Affairs

Attachment

cc (email): Jay Schwarz  
Claude Aiken  
April Jones  
Amy Bender  
Travis Litman



## Section 706 Report and the Role of Satellite in Providing Broadband Services Across the United States

February 2018

- Satellite broadband providers are an integral part of the American broadband ecosystem.
  - Hughes is the largest provider of satellite broadband services in the United States and globally. Satellite broadband providers serve consumers across the country including in rural, remote, and tribal areas, where terrestrial broadband infrastructure can be prohibitively expensive to deploy.
  - On March 16, 2017, with its launch of HughesNet Gen5 over the newly deployed EchoStar XIX, the world's highest-throughput satellite, Hughes became the first U.S. satellite Internet service to offer FCC-defined broadband speeds at and above 25/3 across the continental United States. In the first six months of service, over 340,000 customers were already receiving service at the increased speeds and this number continues to steadily increase.
  - The FCC has found that Hughes's customers receive broadband speeds exceeding 150% of the advertised speed download and nearly 200% of the advertised speed upload.<sup>1</sup>
  - Satellite broadband customers are just as satisfied as the customers of other types of broadband providers.
  - EchoStar XXIV/JUPITER 3, due to launch in early 2021, will further increase speeds and capacity. Other providers are also poised to deploy new upgraded satellites that will further increase capacities and speeds and expand the footprint of next-generation satellite services.
- The Commission should include satellite broadband service in its determination of whether deployment of advanced telecommunications capability is reasonable and timely.
  - Satellite broadband providers now serve significant numbers of customers at or above 25/3 speeds.
  - Progress in satellite broadband service demonstrates that the deployment of advanced telecommunications capability is reasonable and timely.
    - Increasing speeds
    - Significant, ongoing investments
- Satellite broadband is an important advanced communications technology bringing broadband to a significant number of users across the United States. As such, it should be included in the FCC's Section 706 Report.

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<sup>1</sup> 2016 Measuring Broadband America Fixed Broadband Report at 17 Chart 4 (2016).